

**BEFORE THE
PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA**

DOCKET NO. 2019-182-E

IN THE MATTER OF:

South Carolina Energy Freedom Act (H.3659)
 Proceeding Initiated Pursuant to S.C. Code
 Ann. Section 58-40-20(C): Generic Docket to
 (1) Investigate and Determine the Costs and
 Benefits of the Current Net Energy Metering
 Program and (2) Establish a Methodology for
 Calculating the Value of the Energy Produced
 by Customer-Generators

**PETITION TO INTERVENE
 BY NUCOR STEEL –
 SOUTH CAROLINA**

Nucor Steel-South Carolina (“Nucor”), a Division of Nucor Corporation, pursuant to Rule 103-825 of the rules and regulations of the South Carolina Public Service Commission (“Commission”), hereby respectfully petitions to intervene in the above-captioned docket. Nucor states the following grounds in support of this petition:

1. Nucor owns and operates a steel production facility near Darlington, South Carolina. As a retail customer of Duke Energy Progress, LLC, Nucor purchases hundreds of millions of kWh of electricity annually at a cost of millions of dollars per year. Since the cost of electricity comprises one of the major costs of Nucor’s manufacturing process, electric costs directly affect Nucor’s ability to continue to produce steel at a competitive price.
2. As required by Act 62, the Commission opened this generic docket to: (1) investigate and determine the costs and benefits of the current net energy metering program; and (2) establish a methodology for calculating the value of energy produced by customer-generators. Nucor has a stake in, and will be directly and substantially affected by, the outcome of this proceeding. Due to the magnitude of its load and its unique service characteristics, Nucor cannot be adequately represented by any other party to this proceeding. At this early stage in the proceeding, Nucor has not fully determined what position it may take and how long it will take to complete its presentation and any cross-examination during the hearing established in this proceeding. Since 1987, Nucor has actively participated in many previous proceedings before this Commission.

3. Nucor's mailing address is:
Nucor Steel – South Carolina
P.O. Box 525
Darlington, SC 29532
4. Nucor will be represented in this proceeding by the firm of Moore & Van Allen, PLLC. Service and correspondence regarding this proceeding should be sent to the undersigned.

WHEREFORE, for the reasons set forth above, Nucor respectfully requests permission to intervene in this proceeding.

Respectfully submitted,

MOORE & VAN ALLEN, PLLC

A handwritten signature in black ink, appearing to read "Rob Smith", written in a cursive, stylized script.

Robert R. Smith II

100 North Tryon Street
Suite 4700
Charlotte, North Carolina 28202
(704) 331-1000
(704) 339-5870 (fax)
robsmith@mvalaw.com

Counsel for Nucor Steel – South Carolina

Dated: September 17, 2020

**BEFORE THE
PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA**

DOCKET NO. 2019-182-E

IN THE MATTER OF:

South Carolina Energy Freedom Act (H.3659)
 Proceeding Initiated Pursuant to S.C. Code
 Ann. Section 58-40-20(C): Generic Docket to
 (1) Investigate and Determine the Costs and
 Benefits of the Current Net Energy Metering
 Program and (2) Establish a Methodology for
 Calculating the Value of the Energy Produced
 by Customer-Generators

**PETITION TO INTERVENE
 BY NUCOR STEEL –
 SOUTH CAROLINA**

This is to certify that the foregoing document was served upon the following parties at
 the addresses set forth by first-class mail or electronic mail on this the 17th day of
 September, 2020:

Jeffrey M. Nelson, Esq.
 Jenny R. Pittman, Esq.
 Office of Regulatory Staff
 1401 Main Street, Suite 900
 Columbia, SC 29201
jnelson@ors.sc.gov
jpittman@ors.sc.gov

Heather Shirley Smith, Esq.
 Duke Energy Carolinas, LLC
 40 W. Broad Street, Suite 690
 Greenville, SC 29601
heather.smith@duke-energy.com

Rebecca J. Dulin, Esq.
 Duke Energy Carolinas, LLC
 1201 Main Street, Suite 1180
 Columbia, SC 29201
Rebecca.Dulin@duke-energy.com

J. Ashley Cooper, Esq.
 Parker Poe Adams & Bernstein, LLP
 200 Meeting Street, Suite 301
 Charleston, SC 29401
ashleycooper@parkerpoe.com

J. Blanding Holman IV, Esq.
 Katherine Lee, Esq.
 Southern Environmental Law Center
 525 East Bay Street, Suite 200
 Charleston, SC 29403-7204
bholman@selcsc.org
klee@selcsc.org

Jeffrey W. Kuykendall, Esq.
 Attorney at Law
 127 King Street, Suite 208
 Charleston, SC 29401
jwkuykendall@jwklegal.com

K. Chad Burgess, Esq.
Dominion Energy Southeast Services, Inc.
220 Operation Way - MC C222
Cayce, SC 29033
chad.burgess@dominionenergy.com

Marion William Middleton III, Esq.
Parker Poe Adams & Bernstein, LLP
110 East Court Street, Suite 200
Greenville, SC 29601
willmiddleton@parkerpoe.com

Thadeus B. Culley, Esq.
Vote Solar
1911 Ephesus Church Road
Chapel Hill, NC 27517
thad@votesolar.org

Matthew W. Gissendanner, Esq.
Dominion Energy South Carolina, Inc.
220 Operation Way - MC C222
Cayce, SC 29033-3701
matthew.gissendanner@dominionenergy.com

Peter H. Ledford, Esq.
North Carolina Sustainable Energy Association
4800 Six Forks Road, Suite 300
Raleigh, NC 27609
peter@energync.org

Carrie Grube Lybarker, Esq.
Roger P. Hall, Esq.
South Carolina Department of Consumer Affairs
Post Office Box 5757
Columbia, SC 29250
clybarker@scconsumer.gov
rhall@scconsumer.gov

A handwritten signature in black ink, appearing to read "R. Smith", with a stylized flourish at the end.

Robert R. Smith, II